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5 *Attorneys for Plaintiffs*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9  
10 A.H., et al.,

11 Plaintiffs,

12 v.

13 COUNTY OF SAN BERNARDINO, et  
al.,

14 Defendants.

Case No. 5:23-cv-01028-JGB-SHK

*Assigned to:*

Hon. District Judge Jesus G. Bernal  
Hon. Mag. Judge Shashi H. Kewalramani

**JOINT STIPULATION TO  
CONTINUE THE LAST DAY TO  
CONDUCT A MEDIATION AND  
THE DISCOVERY DATES IN  
LIGHT OF THE PARTIES'  
SEPTEMBER 9, 2024 MEDIATION**

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16  
17 **TO THIS HONORABLE COURT:**

18 **IT IS HEREBY STIPULATED** by and between Plaintiffs A.H. and H.H, in  
19 each case a minor, by and through their guardian *ad litem* Crystal Hanson,  
20 individually and as successor in interest to Shane Holland, deceased; C.H., a minor,  
21 by and through her guardian ad litem, Reymi Updike; individually and as successor  
22 in interest to Shane Holland, deceased, and PATRICIA HOLLAND, individually,  
23 and Defendants COUNTY OF SAN BERNARDINO and JUSTIN LOPEZ ("the  
24 Parties"), by and through their respective attorneys of record, as follows:

- 25 1. The Parties have scheduled a mediation with mediator Richard Copeland to  
26 take place on September 9, 2024. The scheduling order sets the last day to  
27 conduct a mediation as July 29, 2024. The Parties have met and conferred  
28 regarding their schedules, and the earliest mutually available date for the

mediation for the Parties and Mr. Copeland is September 9, 2024.

2. The Parties have completed the deposition of Defendant Justin Lopez and have scheduled the depositions of the Plaintiffs. The Parties have scheduled additional officer depositions to take place on June 25, 2024. The Department of Justice recently released its report in this case, and the Parties are in the process of obtaining documents from the Department of Justice relating to this case. Currently, the initial expert disclosure deadline is June 3, 2024. The Parties believe that these depositions and materials from the Department of Justice may be relevant to the expert opinions.

3. Accordingly, the Parties stipulate that the foregoing constitutes GOOD CAUSE to briefly continue the last day to conduct a mediation in this case, as follows:

Event	Current Date	Proposed Date
Last Day to Conduct a Mediation	7/29/2024	9/20/2024
Initial Expert Disclosures	6/3/2024	7/12/2024
Rebuttal Expert Disclosures	6/17/2024	7/26/2024
All Discovery Cutoff	7/1/2024	8/23/2024

**IT IS SO STIPULATED.**

DATED: May 30, 2024

**MANNING & KASS**

**ELLROD, RAMIREZ, TRESTER LLP**

Bv: /s/ Kayleigh Andersen

Eugene P. Ramirez, Esq.

Kayleigh A. Andersen, Esq.

Attorneys for Defendants, County of San Bernardino and Justin Lopez

DATED: May 30, 2024

**LAW OFFICES OF DALE K. GALIPO**

Bv: /s/ Renee V. Masongsong

Dale K. Galipo, Esq.

Renee V. Masongsong, Esq.

Attorneys for Plaintiffs